

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of Petition for Rulemaking,)	
“To Promote Interoperability and Efficient)	RM-10432
Use of Allotted Spectrum for Public Safety)	
Agencies and Other Measures to Address)	
To Address Communications Needs)	
Through the Year 2010.”)	
)	

To the Commission:

**COMMENTS BY THE STATE OF ARIZONA
TO THE NOTICE OF PROPOSED RULEMAKING**

Submitted By:

STATE of ARIZONA
Department of Public Safety
P.O. Box 6638
Phoenix, Arizona 85005-6638

Dated: May 30, 2002

INTRODUCTION

The Arizona Department of Public Safety (ADPS) is filing Comments on RM-10432, Notice of Proposed Rulemaking, relating “To Promote Interoperability and Efficient Use of Allotted Spectrum for Public Safety Agencies and Other Measures to Address Communications Needs Through the Year 2010.”

ADPS , speaking for the State of Arizona, maintains the lead role in Arizona State radio communications, pursuant to Arizona Revised Statute 41-1749A. This Department bids, engineers, licenses, installs, and maintains radio systems for 14 State Governmental entities in

Arizona, including the following:

Department of Administration	Agriculture Department
Army National Guard	Capitol Police
Department Of Correction	Department of Economic Security
Emergency Services Division	Game and Fish Department
Land Department/Forestry Division	Liquor License and Control
State Parks Board	Department of Transportation
Motor Vehicle Division	Department of Health Services

Several of these agencies each have over 2000 mobile and portable radios, and over 30 base/mobile relay stations on various mountaintop repeater sites. Radios maintained by the ADPS exceed 10000 units. These entities have radio license eligibility in the Public Safety radio service. The ADPS assists each of these agencies in obtaining licenses for new sites or frequencies as required. The ADPS maintains over 500 licenses for the user agencies under Parts 90 and 101. The ADPS has had this lead role in Arizona State radio communications systems since its inception in 1969.

COMMENTS:

The ADPS supports improved Federal and state/municipal public safety interoperable communications. Often, in disaster/emergency situations, infrastructure dependent solutions are not available, not feasible, or too difficult to work with. Therefore, infrastructure independent solutions are necessary. We believe that this is best done through both direct licensure and Intergovernmental Agreements (IGA). We believe that it is appropriate that NTIA and the FCC establish a national process in order to streamline access to these interoperable channels. We believe that some form of blanket licensure of qualified public safety agencies on Federal interoperable channels, and FCC blanket licensure of qualified Federal agencies on Part 90

public safety interoperable channels is appropriate. These blanket licenses would dovetail with existing IGAs and Mutual Aid Agreements already in place. We agree with FLEWUG that adoption of interfaces and gateways between public safety agencies and commercial radio services would be beneficial in mutual aid and emergency management situations.

We also concur with FLEWUG that interoperable frequencies below 512 MHz should require Project 25 for digital interface interoperability. While recognizing that narrowband FM will continue to be the primary mode of interoperability below 512 MHz for many more years. We believe that designating Project 25 as the digital standard at this time will steer future systems into the already established (700 MHz) standard for public safety interoperability, and prevent the use of other non-compatible digital modes.

Curt Knight, Manager
ADPS Telecommunications Bureau